FORM

Application for an enforceable undertaking

June 2019

Part 4, Health and Safety at Work Act 2015

The commitments in this application are offered to WorkSafe New Zealand by

Name of entity or, partnership or individual applying for this undertaking

Silver Fern Farms Limited

New Zealand Government

WORKSAFE
Mahi Haumaru Aotearoa

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Mahi Haumaru Aotearoa

FORM

Application for an enforceable undertaking

Part 4, Health and Safety at Work Act 2015

The commitments in this application are offered to WorkSafe New Zealand by

Name of the person or persons who will be signing this undertaking in section 4:

Matt Carter - Chief People Officer

On behalf of:

Silver Fern Farms Limited

Name of the entity giving this undertaking (if an individual or sole trader, leave blank – complete in all other cases)

Silver Fern Farms Limited

This enforceable undertaking is given on the day and date that it is accepted and signed by WorkSafe. The undertaking and its enforceable terms will operate as a legally binding commitment on the part of the person from the date it is given.

Do not refer to the victim by name in this document. Please refer to the victim/worker/employee/volunteer/or other term as appropriate.

WorkSafe respects your privacy and is committed to protecting personal information. The information provided in this document is for the purpose of an undertaking given to WorkSafe under Part 4 of the *Health and Safety at Work Act 2015*. This information will be managed within the requirements of both the *Privacy Act 1993 and the Official Information Act 1982*.

There is an expectation that WorkSafe will generally publish the undertaking in full on its website.

TERM	DEFINITION
Contravention	An action which offends against the *Health and Safety at Work Act 2015* and/or any Regulations made under it. It includes both health and safety contraventions. A contravention also includes an alleged contravention.
HSMS	A Health and Safety Management System.
Person	An individual who or a legal entity which has a duty under the *Health and Safety at Work Act 2015* and can give a written undertaking. The term includes individuals, each partner in a partnership, corporations, trustees of trusts, and crown organisations.
Health and Safety legislation	*Health and Safety at Work Act 2015* and associated regulations.
Enforceable undertaking	An enforcement pathway that allows a duty holder to voluntarily enter into a binding agreement with WorkSafe. The agreement outlines actions the duty holder will undertake to address the contravention. It is expected to deliver activities which benefit workers, the wider industry or sector and/or the community as well as acceptable amends to any victim(s).

WSNZ_2483_JUN19

1. General information

1.1 Details of the person/persons/entity giving the undertaking

Name of person(s) making this undertaking: (in all cases complete with the name(s) of those who are signing this undertaking under Section 4)

Matt Carter - Chief People Officer

Name of entity: (if applicable, leave blank if an individual)

Silver Fern Farms Limited

Type of legal entity: (complete in all cases, for example individual, sole trader, partnership, trust, company, etc)

Company

Nominated contact person: (the same person listed above/one of those listed above)

Matt Carter

Physical address:

283 Princes Street
Dunedin 9054
Otago
New Zealand

Postal address: (if different from physical address)

Work phone: [redacted]

Mobile phone: [redacted]

Email: matt.carter@silverfernfarms.co.nz

Industry: Meat Processing

Workers (enter numbers):

Full-time: ~2000 **Part time:** **Casual:** ~4000 (seasonal)

Description of the products and services provided by the business or undertaking:

Silver Fern Farms Limited is New Zealand's largest livestock processing and marketing company. Silver Fern Farms Limited owns 14 sites across New Zealand and is the leading procurer, processor, marketer and exporter of premium lamb, beef and venison.

Comments:

1.2 Detail of the contravention

Following an incident on 4 January 2022, Silver Fern Farms Limited (SFF) has been charged with one offence under the Health and Safety at Work Act 2015 (HSWA) for failing to comply with the duty to ensure, so far as reasonably practicable, the health and safety of SFF workers.

WorkSafe alleges that it was reasonably practicable for SFF to have:
(a) ensured an effective risk assessment was carried out to identify the risk of Enforce contacting decomposing meat resulting in the formation of chlorine gas;
(b) have provided cleaners with information, training, instruction, and supervision on the risks of handling and using Enforce, including the use of Safety Data Sheets, the correct use of protective clothing and how cleaners are to prevent or minimise exposure to chlorine gas as a result of using Enforce;
(c) developed, implemented, monitored and reviewed processes for using Enforce to minimise contact with decomposing meat; and
(d) ensured suitable emergency procedures were in place, including that all workers knew what actions to take immediately after inhalation and/or skin contact with a hazardous substance.

1.3 Detail the events surrounding the contravention

On 4 January 2022, two Silver Fern Farms (SFF) workers (Worker A and Worker B) were undertaking a pre-start sanitisation clean of the processing area and equipment at SFF's Hokitika processing plant. Hokitika plant is one of SFF's smaller multi species sites with a workforce of approximately 130.

In December 2021, the cleaning team at the Hokitika processing plant had undertaken a thorough shutdown clean before the plant stopped production for ten days over the Christmas period. The pre-start sanitisation clean that took place on 4 January 2022 is a shorter process that involves spraying a diluted chemical foam (Ecolab Enforce Cleaner) on surfaces within the processing areas, leaving it to settle and then hosing it off. The purpose of the pre-start sanitisation clean is to ensure the processing areas and equipment are food-grade ready.

On 4 January 2022, while Worker A was undertaking the pre-start sanitisation clean in the bone crushing room, she encountered dry, decomposing meat residue on the screw conveyor that had been missed during the pre-Christmas shutdown clean. Worker A sprayed dilute Enforce foam onto the screw conveyor. At that time Worker B was working on the other side of the processing plant in a different room.

Shortly after spraying the diluted Enforce foam on to the screw conveyor, Worker A began to feel unwell and proceeded to move outside. Worker B also began to feel unwell, though not to the same extent as Worker A. After contacting the Hokitika plant Section Manager and starting to feel better, the two workers re-entered the processing plant to attempt to finish the sanitisation clean. Both workers again began to feel unwell and could not complete the sanitisation clean. They informed the Section Manager and Engineering Manager. The Section Manager offered to take Worker A and Worker B to the medical centre, but they declined and went home.

Later that evening Worker A and Worker B were not feeling better so both attended Greymouth hospital where they were admitted for observation.

1.4 Detail any enforcement notices issued that relate to the contravention as detailed in term 1.2

DATE	NOTICE TYPE	NOTICE NUMBER	CONTRAVENTION OR PROHIBITED ACTIVITY	ACTION TAKEN IN RESPONSE TO NOTICE
DD / MM / YEAR	Nil issued			
DD / MM / YEAR				
DD / MM / YEAR				

1.5 Detail the rectifications to the workplace or work practices made as a result of the contravention (1.2), events (1.3) and the enforcement notices issued (1.4)

SFF has implemented the following:
1. The Envirox system at Hokitika, which among other things monitors chlorine dioxide levels at SFF sites, was upgraded on 11 March 2022 with input from Nalco/Ecolab. The system alerts (via email and text) relevant personnel of changes in chlorine dioxide levels.
2. On 4 February 2022, SFF implemented a new "Chlorine Testing Procedure – Daily and Extended Break" to manually test chlorine dioxide levels in water for production and non-production days. The procedure includes a log sheet and completion of this is now part of SFF's regular processes.
3. The Hokitika site Engineering Team purchased a new titration kit for testing Enforce levels outside of the monthly checks conducted by Ecolab. Daily testing of Enforce levels was implemented on 16 February 2022 and is ongoing.
4. On 15 March 2022 a new procedure for engineer checks that are to be carried out prior to work both on production days as well as outside production days/hours was established. The procedure and a checklist was rolled out to the engineering team and includes checks such as power, ventilation and water supply.
5. On 15 March 2022 a new 800mm fan was installed to improve ventilation of the Hokitika plant bone crusher room. Subsequently, further investment in ventilation improvements have occurred in other areas of the site.
6. On 25 February 2022 SFF introduced the "Operations Escalation Trigger Points" documents to site departments. These documents establish protocols for escalation of serious events, particularly when working outside of normal working hours.
7. On 28 April 2022 a cleaning procedure specific for shutdowns was implemented.
8. On 23 March 2022 the Hokitika plant site manager updated the Cleaning Team Leader's procedures to ensure clarity around responsibilities and escalation reporting processes
9. Refresher trainings for all existing cleaning staff at the Hokitika plant were undertaken and completed by 23 March 2022.
10. A respirator toolbox session was conducted with all of the Hokitika plant cleaners on 28 July 2022.
11. SFF engaged Chemsafe to conduct exposure monitoring of harmful chemicals at the Hokitika plant on 17 March 2022.
12. Additional chemical awareness training has been provided to all cleaners at the Hokitika plant. The training was completed with external consultants on 25 February 2022 and 22 March 2022.
13. SFF's training standard has been updated to ensure all workers who handle concentrated chemicals complete Hazardous Substances unit standard training as part of SFF's standard training practices.
14. On 6 January 2022 SFF shared the incident learnings with all other sites via a flash report.
15. SFF developed new Significant Incident Response Guidelines and a Coordinated Incident Management System aligned emergency response process as part of a national improvement project. This was implemented at the Hokitika plant on 28 September 2022, with additional follow up refresher training taking place on 24 February 2023. The remainder of the 14 sites implemented have the new systems, with the last completed in November 2023.
16. In order to understand the specific health and safety challenges that cleaners face, members of the Group H&S team conducted multiple visits over the course of 2023 and actively worked alongside cleaning teams from all 14 sites. They collaborated with cleaning teams on 28 occasions and dedicated a total of 134 hours to observations. The team also conducted interviews with key stakeholders including cleaning experts, Cleaning Team leaders, Supervisors, Managers and Training Co-ordinators.

1.6 Total amount of money spent on rectifications

The estimated breakdown of money spent on rectifications is as follows:
- 50k spent on improving ventilation, testing and chemical circulation systems at Hokitika.
- 20k spent on consultants and training.

Indirect costs for labour, project management, travel and advisory have not been included due to using internal resources but we anticipate this would be in excess of 100k+.

1.7 Detail the injury sustained or illness suffered by victim(s) or other(s) as a consequence of the contravention or, (as applicable) the *potential* for fatal injury or future fatal illness

The following information is based on the medical records (provided by WorkSafe) and discussions with Worker A and Worker B.

Worker A was admitted to Greymouth hospital under observation for pulmonary oedema for two nights. Upon discharge she was diagnosed with moderate chlorine toxicity, and was prescribed painkillers and an inhaler. She returned to work on 20 January 2022, as per her return-to-work plan, returned on half days until 24 January 2022. On 24 January 2022, Worker A informed SFF she was feeling good and ready to return to full duties. After returning to work, Worker A continued to experience sporadic respiratory discomfort under certain circumstances such as cold nights (a tight and sore chest) so SFF organised for her to be assessed by a specialist Occupational Physician who diagnosed her with occupational asthma. Since receiving steroids, Worker A made a full recovery and has experienced no further issues.

Worker B was admitted to Greymouth hospital under observation overnight, but no medical records were provided to SFF. After three days off work, Worker B returned to full duties with no lasting effects.

No other workers who completed the pre-start sanitisation clean on 4 January 2022 suffered symptoms.

The exact cause and extent of hazardous substances that caused harm to Worker A and Worker B is unknown.

For completeness, SFF's understanding is that there is no potential for fatal injury or illness (for either worker) as a consequence of the incident.

1.8 Detail any offer of amends or payments made to the victim(s) who sustained injury or suffered illness (the total monetary amount here is also to be included in the table at 3.12.3)

Describe the victim(s) relationship to you/the entity in question: (eg employee(s)/shareholder/director/family member/contractor, etc. If the relationship has more than one dimension, for example a family member who is also an employee and a director and/or shareholder of the business, or an employee who is a shareholder (etc) – then please describe this)

Both Worker A and Worker B are full time employees of SFF. Worker A has worked for SFF since November 2020. Worker B has worked for SFF since December 2021.

Detail offer of amends or payments:

An $8,000 amends payment was made to Worker A on 10 January 2024. Additionally, $409.70 was paid to compensate any loss while on 80% pay from the incidents ACC claim.

A $2,500 amends payment was made to Worker B on 10 January 2024. Worker B suffered no loss of income as time away from work was covered under 100% of ACC payment.

1.9 Detail any consultation with the victim(s) as to their views on whether an enforceable undertaking would be an acceptable alternative to prosecution

Prior to drafting the EU application, SFF consulted Worker A and Worker B who confirmed that they are in full support of this application. Amendments were made to the EU application to recognise their input. A letter in support has been provided by Worker A and Worker B and a copy is enclosed.

1.10 Detail any consultation with unions/sector/industry as to their views on whether an enforceable undertaking would be an acceptable alternative to prosecution

SFF has consulted with and received confirmation of endorsement from the Meat Industry Association (MIA), NZ Meat Workers Union National Secretary, SFF Hokitika site Union Representative and the Hokitika Site Manager.

SFF has also been provided with a letter from Safer Farms, confirming it will accept the donation specified.

Copies of the abovementioned correspondence are enclosed.

1.11 Detail the support provided or proposed by the person to the victim(s), other(s)

DATE	DESCRIPTION OF SUPPORT	COMMENTS
DD / 01 / 2022	Regular welfare checks by the Hokitika plant Site Manager until Worker A	
DD / MM / YEAR	and Worker B returned to work.	
DD / 05 / 2022	Further welfare follow up by SFF's injury recovery resource.	
DD / 05 / 2022	Worker A requested to work on day shift. SFF granted the request and	
DD / MM / YEAR	Worker A now works in the Secondary Butchery.	
DD / 03 / 2023	Worker A referral to Occupational Physician facilitated by SFF.	The referral was made as Worker A was not
DD / MM / YEAR		having success with the treatment plan that local
DD / MM / YEAR		medical resources had provided in relation to her
DD / MM / YEAR		lingering cough. The OP provided a diagnosis
DD / MM / YEAR		and treatment plan which has resolved Worker
DD / MM / YEAR		A's issues. Worker A has since fully recovered.
10 / 01 / 2024	SFF made amends payments to Worker A and Worker B.	

1.12 Detail any current HSMS implemented and maintained by the person

Describe how health and safety risks are managed, including types of procedures or policies or standards:

Ora is the Maori word that can mean to be alive, well, safe, cured, recovered, healthy, fit, or healed. At SFF, the health and safety journey is referred to as Ora, and includes the adage "Mates Keep Mates Safe".

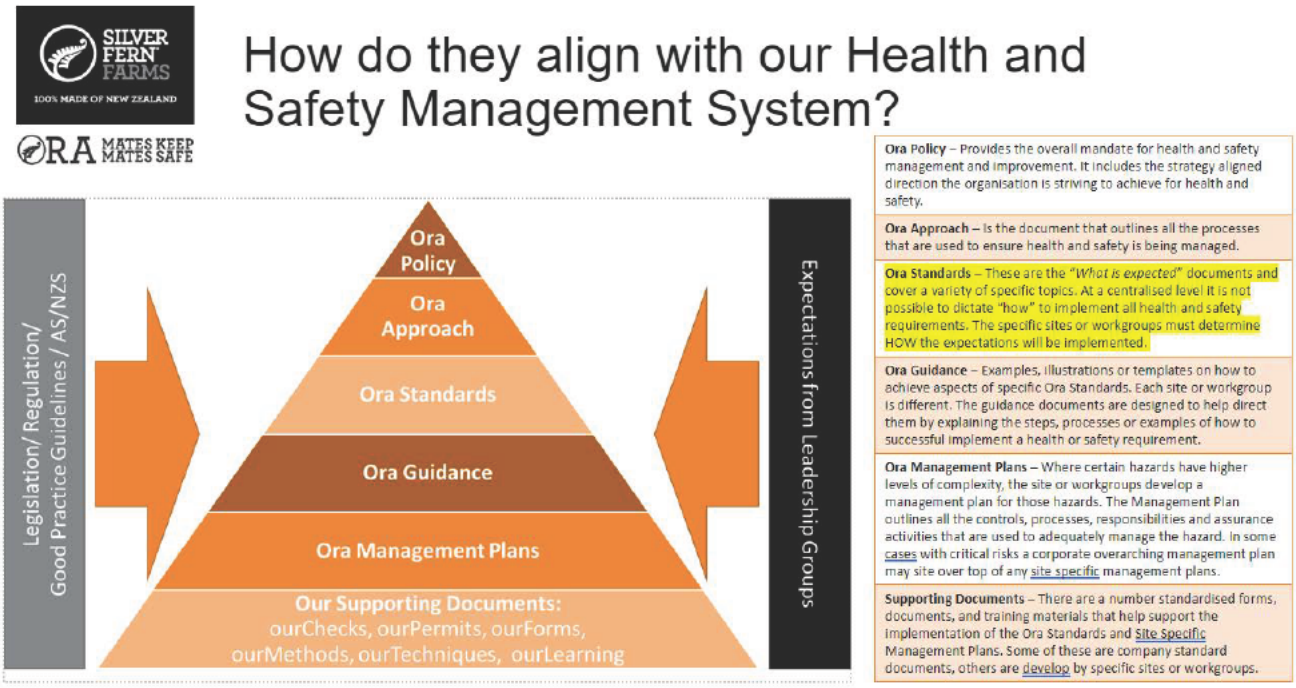
The Ora journey at SFF is currently managed through a health and safety system which covers all of its operations. This is governed by a company Health and Safety Policy which includes an underpinning Health and Safety Strategy focused on demonstrating "Care + Control" for all health, safety, and critical risk levels of harm.

As part of its health and safety system, SFF has implemented the ISO48001:2018 aligned Ora Standards which are bespoke health and safety standards that define the minimum requirements that are expected at all SFF sites. The Ora Standards cover a wide range of topics and provide direction for the way SFF employees work, the conditions they work in, and the equipment that they work with. The Ora Standards have been developed in line with legislative and regulatory requirements, AS/NZS Standards, WorkSafe Guidance and Approved Code of Practice, and various external guidance documents from other government agencies.

SFF is aware that its staff operate in a high-risk environment, and it therefore employs dedicated health and safety professionals to implement and maintain the Ora Standards at both a site and corporate level.

Alongside its formal health and safety systems, SFF recognises the importance of (and has significantly invested in) improving leadership in the health and safety space; SFF has health and safety representatives at all of its sites. SFF holds an annual Runanga event where health and safety representatives come together with the Executive Team and Board of Directors to talk about the challenges that SFF faces in relation to health, safety and wellbeing. Our efforts in this space were recognised in 2023 where SFF were awarded the Supreme Winner category at the SafeGuard awards.

A diagram summarising the SFF HSMS is outlined below:



1.13 Detail the level of auditing undertaken on the HSMS, including compliance audits and audit frequency

Internal health and safety auditing of SFF processing sites is undertaken by the Corporate Health and Safety Team through Ora Evaluations. Ora Evaluations are the checks and measures put in place to ensure that each of SFF's sites are meeting the requirements of SFF's Ora Standards.

During the Ora Evaluations, each site is required to complete a self-assessment against all of the Ora Standards to determine particular areas that need to be improved. The Ora Standards cover a wide range of departments and job types at SFF sites, meaning that the site self-assessments encourage the site Health and Safety Team to interact with different departments and to cover a range of health and safety issues. The Corporate Health and Safety team then visit each site and review the self-assessment to pick up on any other key areas that need to be addressed. This occurs at least three times per year.

Site level routine audits are undertaken using the "ourChecks" system which are customised to meet site specific requirements. These can be daily, weekly or monthly depending on the specific requirements. Each site has a dedicated health and safety Manager / Co-ordinator and alongside the Site Manager they are regularly observing behaviour and compliance with SFF's Ora Standards.

External auditing also takes place at all SFF sites and this includes health and safety elements. External auditing is undertaken by our sophisticated customers who have their own standards to uphold, such as international ILO standards; a number of these customers use international technology and data systems such as SEDEX and its widely recognised SMETA auditing system. Additionally, a number of customers who externally audit SFF supply to McDonalds and therefore need to meet the standards of the Supplier Workplace Accountability (SWA) Program. The SWA Program includes health and safety standards which must be met.

SFF external auditing is conducted by external agencies who enforce regulatory requirements.

Additionally, SFF has obtained ACC tertiary level accreditation (which includes recent audit outcomes) at several of its large plants; this indicates our commitment to health and safety and SFF's Ora Standards.

1.14 Detail the consultation undertaken or proposed to be undertaken, in relation to this undertaking

As per section 1.9 and 1.10 consultation has been undertaken with:
- Worker A and Worker B;
- Safer Farms;
- MIA;
- NZ Meat Workers Union;
- SFF Hokitika site Union Representative; and
- the Hokitika Site Manager.

2. General terms

The person acknowledges and commits to the general terms set forth in the sub-terms below.

2.1 Acknowledgement that WorkSafe alleges a contravention occurred as detailed in term 1.2

Silver Fern Farms acknowledges that contraventions have been alleged as outlined in section 1.2 above.

2.2 Statement of regret that the contravention occurred

SFF's Board and management express their heartfelt regret that this incident occurred and that Worker A and Worker B suffered injuries. These circumstances have reinforced the need for robust systems and monitoring to ensure compliance with those systems. SFF invests heavily in improving its health and safety systems, practices, and culture to prevent injury.

One of SFF's three guiding values is always 'caring'. As this incident has occurred, SFF knows that it has not achieved its own expectations. SFF acknowledges that this incident should not have occurred.

2.3 Statement of the reasons why, on balance, the person considers this undertaking is the most appropriate response to the contravention

As a leading food company in New Zealand (which operates 14 processing plants and employs 6,000+ people), SFF is well placed to invest and promote these EU initiatives within its own workplace and the industry. It considers that the initiatives within this EU will provide crucial knowledge to other operators, which will benefit workers nationwide.

In the circumstances, the harm caused was not serious. Further, the Safety Data Sheets for the product used had been considered by SFF and it appeared that there was no risk of using the chemical in that manner. This is a case where SFF had already taken steps, and the potential benefits of the undertaking are an appropriate response to the alleged contravention.

The primary focus of this EU application is to create a safer workplace, particularly for cleaners, at SFF, other companies in the meat processing industry and ultimately the wider community. SFF actively contributes to initiatives that will help to improve working conditions, and it is well placed to enable and support the distribution of resources and training initiatives that are produced through this EU to the wider industry.

While SFF does not deny that, in this instance, there were contributing factors that did not meet the highest standard of its commitment to worker safety, SFF has the greatest desire to continuously improve the health and safety of its employees, provide a safe working environment, and share its learnings with other PCBUs in the meat industry.

SFF wants to use this unfortunate incident to improve the lives of all workers in what is a large meat processing workforce. SFF has consulted closely with both Worker A and Worker B on this EU application and appreciates their support.

2.4 Statement of commitment that the behaviour, activities and other factors which caused or led to the contravention has ceased and will not reoccur

SFF has recognised the disproportionate risk that cleaners face and is undertaking a broad project targeted at improving the health and safety of all risks to cleaners (not just hazardous substances and emergency response). This initiative commenced prior to the contemplation of this application, and it has recently been reviewed and received endorsement by the Board.

SFF is committed to ensuring, so far as is reasonably practicable, that its workers understand the importance the behaviour, activities and other factors which caused or led to the contravention have ceased and will not reoccur.

2.5 Acknowledgment of the policy published by WorkSafe for the acceptance of an undertaking

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

has read and understood the Enforcement Undertaking Operational Policy.

2.6 Acknowledgement that this undertaking will be published and publicised in full

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

acknowledges that the undertaking will, if accepted, be published on WorkSafe's website in full and referenced in WorkSafe material.

2.7 Statement of the person's ability to comply with the terms of this undertaking and meet the projected costs of the activities

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

has the financial ability to comply with the terms of this undertaking and have provided evidence by way of

(type of evidence provided)

Letter Signed by the Chief Financial Officer

with this undertaking to support this declaration.

In the event of impending receivership, liquidation or sale of the entity, (write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

will advise WorkSafe of the relevant circumstances and its capacity to comply with the outstanding terms of this undertaking.

2.8 Statement outlining any relationship between the person and any corporations, officers, employees, contractors, proposed beneficiaries of donations or scholarship or other recipient of financial benefit contained in this undertaking

The rectifications outlined above will benefit SFF's health and safety systems at Hokitika and nationwide.

Safer Farms will benefit from SFF's donation for the purposes of promoting farmer industry safety.

Others in the meat processing industry will benefit from the dissemination of cleaner safety initiatives and safety videos.

2.9 Statement regarding Intellectual Property

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

grants WorkSafe a perpetual, non-exclusive, worldwide and royalty-free licence to use, for any purpose, all Intellectual Property Rights in relation to any material developed as a result of this undertaking. This licence includes the right to use, copy, modify and distribute the materials.

2.10 Acknowledgement that the person may be required to provide a statutory declaration

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

acknowledges that it may be necessary for WorkSafe to obtain a statutory declaration outlining details of any prior convictions (safety related) outside of New Zealand and that it will provide such declaration if required by WorkSafe

2.11 Statement of commitment from the person to participate constructively in all compliance monitoring activities for this undertaking

1. It is acknowledged that responsibility for demonstrating compliance with this undertaking rests with the person.
2. Evidence to demonstrate compliance with the terms will be provided to WorkSafe by the due date for each term.
3. The evidence provided to demonstrate compliance with this undertaking will be retained by the person until advised by WorkSafe, that this undertaking has been completely discharged.
4. It is acknowledged that any failure to meet the due date for an enforceable term will result in the matter being escalated and may lead to enforcement action.
5. It is acknowledged that WorkSafe may undertake other compliance monitoring activities to verify the evidence and compliance with an enforceable term, and cooperation will be provided to WorkSafe.
6. It is acknowledged that WorkSafe may initiate additional compliance monitoring activities, such as inspections, as considered necessary at WorkSafe's expense.
7. It is acknowledged that details of all seminars, workshops and training conducted by a non-registered training provider must be notified to WorkSafe, by email, at least one week prior. Notification should include time, date, location and the trainer/facilitator.

(write the name of the person(s) or entity giving the undertaking)

Silver Fern Farms Limited

3. Enforceable terms

The person acknowledges all activities set forth in the enforceable terms below must be auditable and include a date for completion and an estimated cost for each activity.

The person commits to performing the activities below diligently, competently and by the respective completion date.

3.1 A commitment by the person to perform activities that will ensure the ongoing effective management of risks to health and safety in the future conduct of its business or undertaking

Detail the management strategies to be employed that will satisfy and demonstrate to officer/s of the person that this commitment is being met:

At SFF we are committed to the safety and wellbeing of our people. Representing the largest producer and 25% of the red meat industry workforce, we want to make the industry safer not only for ourselves but all participants.

SFF commits to continuing to improve its health and safety systems at Hokitika and at all of its sites around New Zealand. The work that SFF has completed since the incident (outlined above) provides the foundation for SFF's ongoing work to prioritise cleaner safety.

The undertakings as set out in this document will also ensure ongoing effective management of risks to health and safety, including localised improvements at the Hokitika plant and providing additional material that will be used industry-wide through the activities outlined in section 3.3, 3.4, and 3.5.

As noted in section 1.5, our Group Health & Safety Project Delivery team conducted multiple site visits throughout 2023 to understand the specific health and safety challenges faced by cleaners. They collaborated with cleaning teams across all 14 sites, dedicating a total of 134 hours to observations and conducting interviews with key stakeholders. Key context from their findings relevant to this EU have been provided in Appendix A.

We are fortunate to have a dedicated health and safety project delivery team, an internal videographer team specializing in training video development, and expertise in food safety and procurement. Each of these resources will be invaluable in delivering a cross functional quality outcome from the EU. We are well-positioned to develop and distribute high-quality materials to industry participants and engage with them in terms they will understand and value, which will yield positive outcomes for both SFF and the wider industry.

To demonstrate our commitment to the activities under this EU, SFF commits to:
1. Allocate specific project resources from the Group Health and Safety Team, including recruiting for a new role if necessary.
2. Conduct monthly project meetings with the delivery team to discuss project updates, completion timeframes, and potential issues, with no less than 10 meetings per year (with consideration of public holiday periods).
3. Manage any external expenses required in the SFF "PowerPPM" Project Management system for record-keeping and auditing purposes.
4. Appoint members from the Executive and Operations Teams for project governance, conducting quarterly governance meetings.
5. Maintain records of all project and governance meetings to aid an independent and external review.
6. Provide a biannual independent external audit and report of SFF's EU progress to the SFF Board (at SFF expense, estimated to be 8k). We have approached Robyn Bennett to undertake this work due to her expertise in both auditing and hazardous substances. (https://avidplus.co.nz/Robyn-Bennett-Profile.php)

In relation to the activities to be undertaken in sections 3.3 and 3.4, most objectives will be completed using internal SFF Capability. These are indicated by an * in the cost column. Costs included are those where external labour or purchasing physical resources have been costed or required. We have excluded incidentals such as travel, printing materials, or replacing PPE as it is assumed this is covered under already existing internal budgets at SFF with values determined at the time the activities are undertaken. Further details and estimates for internal costs are provided in Appendix B. Assurance activities to provide confidence of internal labour use and quality of outcomes have been outlined in section 3.1.

3.2 A commitment by the person to disseminate information about this undertaking to workers, and other relevant parties

(this may include to work health and safety representatives and in the organisation's annual report, if applicable)

Dissemination will be achieved by doing the following:

Dissemination will be achieved as follows:

- A memorandum to all Health and Safety representatives and workers in the cleaning team at each of SFF sites will be issued and hard copies provided to them;
- A memorandum will be placed in the common room at all SFF sites and this will be available to all SFF workers for six months; and
- A copy of the EU will be provided to those parties that have provided written approval and any recipient of funds as part of this EU.

Dissemination will occur no later than one month after the EU is accepted and signed by WorkSafe.

Dissemination will occur by: DD / MM / YEAR

3.3 Activities to be undertaken to promote the objectives of the health and safety legislation that will deliver benefits for workers and/or work and/or the workplace

ACTIVITIES Outline the activity and the expected outcomes	COST ($)	TIMEFRAME
3.3.1 Complete a localised cleaning improvement investment at SFF's Hokitika plant.	* $55,000	Within 24 months
3.3.2 Assess SFF's other 13 sites to identify and scope any localised improvements (similar to Hokitika	*	Within 24 months
3.3.3 Rationalise open plant cleaning chemical use so there is more standardisation	* $5,000	Within 24 months
3.3.4 Develop internal guidance + training on optimised chemical dispensing and application systems	*	Within 24 months
3.3.5 Complete a targeted chemical first aid and injury prevention campaign.	*	Within 24 months
3.3.6 Implement "5S Principles" (e.g. colour code and standardisation) for cleaning instruments.	*	Within 24 months
3.3.7 Undertake a series of trials with Personal Protective Equipment (PPE) to identify PPE what changes can be made to both keep cleaners safe but ensure they are comfortable to ensure ongoing compliance. If better solutions are found, roll out to all cleaners.	* $5,000	Within 24 months
Total estimated cost of benefits for workers/others	$ 65,000	

3.4 Activities to be undertaken to promote the objectives of the health and safety legislation that will deliver benefits for the wider industry or sector

ACTIVITIES Outline the activity and the expected outcomes	COST ($)	TIMEFRAME
3.4.1 Sponsor the development of industry (MIA) specific H&S Guidance Material	$30,000	Within 24 months
3.4.2 Consulting with MIA, develop at least 4 training videos focused on key cleaner high-risk tasks	* $45,000	Within 24 months
3.4.3 Share the learnings of the incident through engagement(s) with other MIA members.	*	Within 24 months
3.4.4 Conduct an information sharing event with MIA members providing internal learnings from 3.3.3 (Rationalised Chemical Use)	*	Within 24 months
3.4.5 Convert materials developed under section 3.3.4 (Chemical Dispensing Guidance) so they can be used by all MIA members, then provide to MIA	*	Within 24 months
3.4.6 Convert materials developed under section 3.3.5 (Chemical First Aid) so they can be used by all MIA members, then provide to MIA.	*	Within 24 months
3.4.7 Conduct an information sharing event with MIA members providing learnings from 3.3.6 (Instrument Standardisastion)	*	Within 24 months
3.4.8 Conduct a physical demonstration of PPE findings from section 3.3.7 (PPE Trial Findings) with MIA members.	*	Within 24 months
3.4.9 Provide person(s) with cleaning safety expertise to complete an onsite engagement with at least 10 MIA member organisations.	*	Within 24 months
Total estimated cost of benefits for industry	$ 75,000	

3.5 Activities to be undertaken to promote the objectives of the health and safety legislation that will deliver benefits for community

ACTIVITIES	COST ($)	TIMEFRAME
3.5.1 Donate to Safer Farms to support their "Half Arsed Stops Here" campaign targeted at reducing harm in the agricultural sector	$20,000	Within 14 days
Total estimated cost of benefits for the community	**$** 20,000	

3.6 Where WorkSafe considers appropriate in the circumstances, undertaking a SafePlus Onsite Assessment

Further information about SafePlus can be found here: worksafe.govt.nz/about-us/who-we-are/our-priorities/safeplus/about-safeplus

3.6.1 The suitability of a SafePlus assessment will be determined by the Enforceable Undertakings Panel when your application is considered.

3.6.2 In addition to the total cost below (3.7) all costs of a SafePlus Onsite Assessment will be met by the person making this undertaking. The fee charged for an Onsite Assessment is a commercial matter between your business and the SafePlus Accredited Assessors that you commission.

3.7 Minimum spend

(write the name of the person(s) or entity giving the undertaking)

3.7.1 Silver Fern Farms Limited

commits to a minimum spend of $ 170,909.70 for this undertaking.

(write the name of the person(s) or entity giving the undertaking)

3.7.2 Silver Fern Farms Limited

agrees to spend any residual amount arising from an original term not being completed or being less costly than estimated in this undertaking. Agreement on how to spend this residual amount will be sought from WorkSafe

(write the name of the person(s) or entity giving the undertaking)

3.7.3 Silver Fern Farms Limited

Acknowledges the minimum spend comprises of the:

TOTAL COST	MINIMUM SPEND
Financial amends paid to victims (if applicable)	$10,909.70
Benefits to workers/others	$65,000
Benefits to industry	$75,000
Benefits to community	$20,000
Estimated cost of the undertaking Plus GST (if any)	**$** 170,909.70

4. Execution

Authorised representative of an organisation

Undertaking given by (name of authorised representative)

Matt Carter

In my own right and in my capacity as (eg President, Chairperson, etc)

Chief People Officer

of (eg organisation name)

On the (day) 17 day of (month) June , 20 24 (year).

Signature of the person giving the undertaking:

[redacted]

Undertaking given before me:

Witness name: [redacted]

Witness address:

[redacted]

Witness signature:

[redacted]

5. Acceptance

This undertaking is accepted by WorkSafe.

On the (day) 21 day of (month) June , 20 24 (year).

Signature of person accepting the undertaking:

[redacted]

Name of WorkSafe representative: (General Manager, WorkSafe (or delegate))

Tracey Conlon

Undertaking given before me:

Witness name: Karen Harvey

Witness address:

Wellington

Witness signature:

[redacted]

Appendix A – Meat Industry Cleaner Safety Context

Introduction

Cleaning plays a vital role in ensuring the safety and quality of food in meat processing plants. A clean facility minimizes the risk of foodborne illnesses, recalls/ customer claims, and enhances customer satisfaction and trust. Cleaning is the first step in the process; without a properly cleaned plant, the first shift of the day can't commence, and the industry cannot export New Zealand's premium red meat to the world.

Publicly available prosecution data from the past decade shows that meat processing cleaners have been involved in 33 serious incidents. SFF internal data indicates that cleaners are approximately twice as likely to experience health and safety events compared to our broader workforce. However, since cleaners are a relatively smaller group when compared to the workforce at large (they constitute only about 3% of the overall harm in the organization), there's a risk of their issues being overlooked.

Meat processing plants are inherently hazardous environments, and cleaning teams face a range of risks, including exposure to biological and chemical agents used for cleaning, working with dismantled machinery, musculoskeletal issues from heavy lifting, slips, falls, cuts, lacerations, lone working or limited supervision, and psychological stresses such as fatigue due to late-night or early morning cleaning. These risks can result in severe injuries, illnesses, with potential for fatalities.

SFF has made strides in improving cleaner safety. We have enhanced training, and awareness regarding hazardous substances for cleaners, completed machine safety upgrades with cleaner safety in mind, introduced a new enhanced and simplified "Lock out, test out" (LOTO) energy isolation training program, as well as other physical enhancements like fall protection rails and improved chemical dispensers. In particular SFF was recognised as a finalist in the Health category at the 2022 SafeGuard Awards for the work we did between 2019 and 2021 to simplify complex hazardous substances information, subsequently speaking at conferences and writing articles for the Safe Guard magazine to share our approach and templates. These templates were also shared with WorkSafe. While these efforts have made improvements and reduced risk they were targeted at specific and known issues. We recognised that a more holistic approach to cleaner safety was the next step in our improvement journey.

In late 2022, recognising the specific risks to cleaners, the SFF Executive supported investment in investigating a holistic approach to cleaner safety. By allocating dedicated resource and focus, we aimed to analyse the current state of cleaning safety, identify main challenges and gaps, and propose comprehensive recommendations for improvement. An additional project resource was employed and in 2023 members of the Group H&S Project Delivery team conducted multiple visits and actively worked alongside cleaning teams from all 14 sites (from Dargaville to Invercargill). They collaborated with cleaning teams on 28 occasions and dedicated a total of 134 hours to observations. The team also conducted interviews with key stakeholders including frontline cleaners, cleaning experts, Cleaning Team leaders, Supervisors, Managers and Training Co-ordinators to understand the specific challenges and solutions.

The meat industry in general face more difficulties than other industries in finding the best way to balance worker and food safety needs. Overseas markets set strict food safety/export quality standards that are relayed through the Ministry of Primary Industries (MPI) requirements. Animal Products Act 1999, Animal Products Regulations 2021, Risk management programmes (RMPs), Industry Standards, and Codes of Practice are some of the food safety requirements that at times create compromises when it comes to personal safety, such as what cleaning processes and chemicals must be used for cleaning.

Completing this discovery work in 2023 has put us in a unique position where we have developed a detailed understanding of the cleaning process, the personal safety risks, and opportunities to make improvements while balancing the requirements put on us as an industry.

The Cleaning Process

The process for cleaning generally starts with hot hosing surfaces and sweeping large (visible) contaminants, this is followed by an application of a diluted cleaning agent, usually via a central foaming system, but can also be carried out by diluting chemical with water in buckets and applying it manually. The foam is left to sit for a period and then the surfaces are scrubbed. A final rinse is then applied to remove the chemical residue. Some equipment like chopping boards will be soaked in diluted chemicals before being scrubbed and/or water blasted.

Illustration: Hot hosing and sweeping

Operators use a variety of chemicals, many of which are corrosive in nature. The chemicals are used to denature fats, microbiological hazards and proteins that are waste products of production to make the production areas hygienic for food manufacturing. Within the food industry we are subject to regulation from MPI and customer audit requirements which require us to test surfaces, products, and equipment for microbiological hazards. The chemicals used are designed to control this hazard. We are limited in the chemicals we are approved to use for this task by MPI and we may only use chemicals from an approved list, Link below.

Register of approved non-dairy maintenance compounds (foodsafety.govt.nz)

Decanting of chemicals varies between companies as well as individual sites within SFF. Some sites have mechanical devices available for mixing different concentrations or standardising the concentration of the chemical, some sites have portable systems, others are fixed. Sites that do not currently have these devices use a manual decanting processes – for example hand pumps into water filled buckets.

Illustration: Four different methods widely used by the industry for chemical delivery

The operators work with hot water hoses that help with the sterilisation process. This produces a significant amount of steam and despite significant ventilation makes the work environment hot and limits operator visibility. The environmental temperature and steam provide a challenge for selection and use of personal protective equipment because equipment such as chemical goggles, safety glasses, and face shields fog up presenting a secondary visibility hazard and equipment such as chemical resistant clothing can make working conditions uncomfortable for the workers due to temperature.

Illustration: Hot and humid environments

Examples of Risks, Hazards, and Challenges Typical for Cleaners

Hours of Work

Timing of cleaning activities varies across industry and is generally subject to the seasonal nature of production hours, which are in turn set by the 'grass curve', when farmers provide stock based on the availability (or lack of availability) of feed on their farm. During peak season most cleaning teams begin work at around midnight daily with sites operating between five-six days per week.

The work hours and the nature of the work are generally considered unattractive to many people and despite improving pay, the workforce is still quite transient. High rates of absenteeism and retention issues present a constant training burden on the cleaning management teams.

Language and Literacy

A large portion of cleaning teams are composed of workers for whom English is a second language, there is an even mix of male and female workers and there is generally an even distribution of age of workers across each site. Cleaning workers come often with limited educational and literacy backgrounds. Cleaning roles are often entry level positions and for many who apply with us, it is their first employment in NZ or a second job to provide supplementary household income. These factors present challenges when most training for cleaners are in written from and there is the risk of mis-interpretation.

Ergonomics

There are ergonomic hazards that present while carrying out their tasks that can result in musculoskeletal issues if left unmitigated. Quality and hygiene requirements mean that all elements within our work rooms must be cleaned to a high standard. Some machinery, such as belts, may be close to the ground and physically more challenging to clean. Heavy hoses are dragged around, and they must navigate around a myriad of conveyors and machinery to effectively clean. Cleaners, however, are generally more mobile in their activities than other elements of the meat industry workforce and if having worked in the role for a period have higher levels of physical fitness.

PPE

Personal Protective Equipment (PPE) selection for this workgroup can be challenging. The operators work in hot, steamy environments and need to be mobile. PPE like goggles, face shields and safety glasses quickly fogs up creating a secondary hazard. The environmental temperatures mean that heavy chemical resistant clothing can be very cumbersome and uncomfortable for the operators, and again, presents secondary hazards for body temp management and risks surrounding fluid loss. Damage to the knee areas leave opportunities for chemical to seep onto the skin.

Appendix B – Details of Proposed Activities outlined in Section 3.3

Foreword:

The proposed activities will necessitate substantial internal resources and investment, including staff time, transportation, staff expenses, and the development and delivery of training materials. SFF is committed to providing these resources and is dedicated to implementing the proposed initiatives.

We estimate that the completion of this work will cost approximately **65k**, which includes the costs of external labour and the purchase of physical resources.

We have not included incidental costs required to deliver the outcomes, such as travel, printing materials, or replacing equipment and PPE. However, we estimate these costs to be around **220k**. We also anticipate that the impact on internal resources will be equivalent to **317 working days**, but we have not assigned a monetary value to this.

3.3.1 Complete a localised cleaning improvement investment at SFF's Hokitika plant

As previously stated, some sites have mechanical devices available for mixing different concentrations or standardising the concentration of the chemical, some sites have portable systems, others are fixed. Sites that do not currently have these devices use a manual decanting processes – for example hand pumps into water filled buckets.

At the Hokitika site they already have a mechanical device for delivering foaming solution for cleaning. The current system is fit for purpose but is dated and measures using an analogue mechanism with digital monitor to ensure foam consistency. This requires more consistent monitoring relying on more administrative controls to guarantee foam consistency and dilution are set correctly.

In consultation with the injured persons, they proposed as part of the EU that the system be upgraded to a newer system that included:

- Installing a digital dosing and self-monitoring foaming system;
- Installing a self-bunded mixing "day" tank which is feed by an IBC; and
- Adding an additional foaming point.

The benefits:

1. A digital self-monitoring foaming system will reduce the frequency of inspections required to ensure consistent dilution as well as prevent unauthorised people from making changes to the concentration levels as a digital system is secured through access codes which will be held by the maintenance team.

2. Foaming systems do not usually use a 'day tank' as they are considered a "nice to have" (approximately an additional 15-20k cost). Most foaming systems (like the current Hokitika system) draw straight from the concentrated chemical, mix it with water, and then add air to create the foam. A monitoring system is used to ensure the correct concentration is being delivered and adjusts water pressure accordingly. The day tank method means that the concentrated chemical is already premixed (to a safe level) with water into a 1000L tank (enough to complete the required cleaning with surplus). Monitors within the tank guarantee that the full tank is at the preset safe concentration level which also makes it impossible for cleaners to increase concentrations due to a perceived belief it will clean quicker. The cleaners draw from the premixed tank. This makes it both safer and more efficient.

3. The upgrade will also change the concentrated chemical dosing point from 100L chemical barrels to a single 1000L IBC tank eliminating manual handling (IBC will be loaded by a forklift). This will reduce the need to handle instruments with concentrated chemical present to 1/10th the previous process.

4. The additional foaming point will reduce the length and weight of hose required to foam the secondary butchery. It will mean that cleaners no longer need to pull the hose under conveyor belts to access key areas, improving ergonomics and making the cleaning process more efficient and pleasant for the cleaning team.

5. The design also includes installing all available safety features that are not commonplace on all foaming systems, including a backflow preventor, process and emergency stops at the out-feed locations (linked to both the air and chemical feeds). An important feature is that stops are linked to both the air and chemical lines. This provides cleaners with more options to manage their safety as well as productivity, most systems only do one or the other.

We anticipate that the system will be installed by contractors but overseen by an internal Project Manager resource. The cost for this internal resource has not been included in the anticipated **55k** costs to install the system but we would expect that this would represent between **5-10%** on top of the 55k.

Once installed and the system is working as intended, we are committed to sharing the design with the MIA and promoting the benefits to others in the industry of including additional features as outlined.

Illustration: P&ID Drawing of the proposed new foaming system

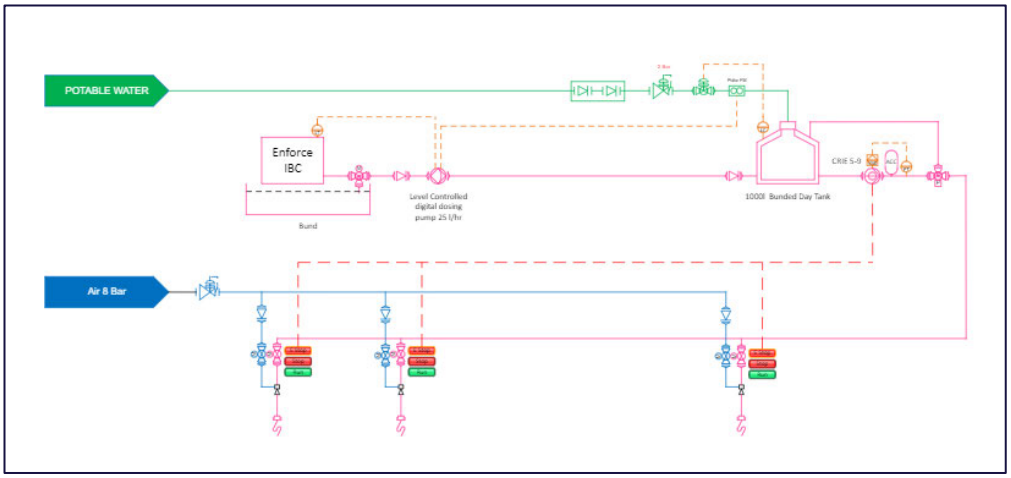


Illustration: Self-bunded chemical "day" tank concept

3.3.2 Assess all SFF's other 13 sites to identify and scope any localised improvements (similar to work completed at Hokitika).

As outlined in the localised cleaning improvement for Hokitika, we believe there will be benefit in reviewing all the current systems which range from automated dosing right through to manual decanting.

For context the Hokitika site is one of our smaller sites, approximately 150 workers, and it took a Project Engineer approximately 4 days to consult with the site, refine the design for feasibility and draw the concept to obtain quotes. Our largest site has 1200 workers, processes multiple species and is spread over a much larger physical footprint.

The Hokitika solution is not a universal solution but has identified some processes and benefits that we might be able to apply at other sites. Each site's system will need to be assessed, cleaning workers consulted, and a tailored solution created. We estimate that this will take one Project Engineer about **72 working days**. This activity is planned to be done by internal resource and the overhead cost for travel and incidentals have not been added as we expect this will be covered by current budgets.

Each design will be loaded into our PowerPPM Project management tool which is used to prioritise Ora (H&S) Capex projects. Projects will then be selected and completed in line with funding and prioritisation. We have several other Ora Capex investments already underway focusing on improving machine, ammonia, and fall from height risks to name a few. The PowerPPM process allows us to prioritise investment for which these cleaner safety improvements will be included. Without doing the evaluation and design work, it is hard to estimate the investment needed, but we would estimate that to upgrade all sites it will be more than $1m.

Illustration: SFF Site Network

3.3.3 Rationalise open plant cleaning chemical use so there is more standardisation

Our choices of cleaning chemicals are limited due to strict MPI guidelines, and we cannot consider alternative cleaning methods that do not involve chemicals, without introducing more serious risks.

Our internal review conducted in 2023 revealed that we use 19 different chemicals across 14 sites. We believe that reducing this number through a rationalisation process will lead to more standardisation. This, in turn, will enhance the quality and comprehensiveness of our training materials, and allow us to implement targeted interventions to modify our cleaning techniques and tools. We believe this will lead to safer and more efficient cleaning practices which will benefit the industry as a whole.

The rationalisation process can be clarified as follows:

1. Form a cross-functional team that includes members from operations, food safety, and procurement, along with an external hazardous substances expert.

2. Collaborate with our cleaning chemical supplier to explore all possible MPI approved options for all application tasks.

3. Conduct a review of the health and safety impacts of the available options and choose the ones that are most effective and pose the least risk.

4. Consult with the workgroups that will be affected, including contractor cleaners, to get their input and buy-in.

5. Eliminate the options that were not selected in the review process.

6. Carry out change management activities with the groups that will be affected to ensure a smooth transition.

We anticipate the review to be conducted using already available internal resources but supported by an external partner. The **5k** is to allow for the consultation costs of the external partner.

3.3.4 Develop internal guidance and training on optimised chemical dispensing and application systems.

This activity centres on the completion of the cleaning chemical rationalisation. Once the chemicals are standardised, it enables the creation of more specialised and detailed training and guidance materials. The outcomes of this activity will include:

1. The creation of an Ora Guidance document that focuses on chemical dispensing and application systems.

2. The revision of existing training materials or the development of new ones, with a greater emphasis on specific information about correct chemical dispensing techniques based on chemical type.

We anticipate that this work will be completed using internal resources with estimations on labour and incidentals included in the foreword.

3.3.5 Complete a targeted chemical first aid and injury prevention campaign.

All SFF sites have first aid trained personnel on all shifts, including within the cleaning teams. However, the current generic first aid training does not equip first aiders and cleaning teams with the knowledge to understand how specific chemicals can cause injuries, how to treat chemical-related injuries, and how to report such incidents.

Therefore, following the cleaning chemical rationalisation, we propose to:

1. Develop a simplified first aid treatment guide for each rationalised cleaning chemical. This guide will be located with or near the storage locations or Safety Data Sheets (SDS).

2. Conduct a gap analysis and subsequently upgrade the contents of the site's first aid kits (if required) to ensure they can respond to specific chemical incidents or injuries.

3. Create a first aid training module (or video) specifically focused on cleaning chemicals response.

4. Develop and distribute promotional materials to raise awareness about cleaning chemical injuries and first aid responses.

We anticipate that this work will be completed using internal resources with estimations on labour and incidentals summarised in the foreword. The costs for new first aid equipment, as well as the development, printing, and distribution of materials will be managed within our existing internal budgets.

3.3.6 Implement "5S Principles" (e.g. colour code and standardisation) for cleaning instruments.

Once the cleaning chemical rationalisation is completed it will allow us to standardise the instruments and tools that are used for cleaning using 5S principles.

5S Principles are a set of workplace organization methods that aim to improve efficiency, safety, and quality. The name 5S comes from the Japanese words seiri (sort), seiton (set in order), seiso (shine), seiketsu (standardize), and shitsuke (sustain). By applying these principles, we can eliminate waste, reduce errors, and prevent accidents.

For cleaning instruments and tools, the implementation of 5S Principles should look something like this:

- **Sort**: We will remove any unnecessary items from the cleaning stations, dispose of them or store them in designated separate areas. For the items kept, we will colour code or label the items according to their type and frequency of use.

- **Set in order**: We will arrange the cleaning instruments and tools in a logical and ergonomic way, so that they are easy to access and use. We will also use colour codes and signs to indicate where each item belongs and how to use it properly.

- **Shine**: We will establish routine inspections for the cleaning instruments and tools to ensure that they are in good working condition.

- **Standardize**: We will update the standard operating procedures for cleaning tasks and train the cleaners on how to follow them. We will also monitor and audit the cleaning processes and ensure that they comply with the quality and safety standards.

- **Sustain**: We will maintain and review the 5S system periodically and encourage the cleaners to participate and provide feedback. We will also recognize and reward the cleaners for their efforts and achievements in implementing 5S Principles.

By applying 5S Principles to our cleaning instruments and tools, we hope to create a more organized, efficient, and safe working environment for our cleaners as well as reduce the risk of incompatible substances being used in the wrong containers or tools.

We anticipate that this work will be completed using internal resources with estimations on labour and incidentals summarised in the foreword. The costs for new tools or instrument's, shadow boards and labelling, will be managed within our existing internal budgets.

3.3.7 Undertake a series of trials with Personal Protective Equipment (PPE)

Selecting Personal Protective Equipment (PPE) for this workgroup presents a challenge. The operators work in hot, humid conditions and need to stay mobile. PPE such as goggles, face shields, and safety glasses can quickly fog up, creating an additional hazard. The high temperatures make heavy chemical-resistant clothing cumbersome and uncomfortable for the operators, leading to secondary hazards related to body temperature management and fluid loss.

While PPE is considered a "soft" control in the hierarchy of control measures, it is crucial for safely handling and using hazardous substances. Most injuries among cleaners at SFF have occurred due to damaged, unsuitable, or missing PPE.

Low adoption rates often stem from the PPE being unsuitable for the expected environment. The goal of this activity is to collaborate closely with PPE providers to trial and identify PPE solutions specific for cleaners that offer effective protection, comfort, and accessibility to all users.

This will be accomplished by:

1. Evaluating existing PPE options.

2. Sourcing and trialling alternative PPE solutions, assessing them based on protection, comfort, and accessibility.

3. Collaborating with PPE suppliers to develop alternative solutions where current PPE offerings are not suitable.

4. Selecting and standardizing the minimum PPE requirements for cleaning teams.

We anticipate that this work will be completed using internal resources with estimations on labour and incidentals summarised in the foreword. The costs for trial PPE and any require R&D will be covered under the indicated **5k** allocation proposed. Cost to implement the new PPE will be managed within our existing internal budgets.

Appendix C – Details of Proposed Activities outlined in Section 3.4

Foreword

As mentioned in section 3.1, SFF is well-equipped to utilize our internal resources to implement most aspects of the EU proposal. As the largest entity representing 25% of the industry, any work that benefits us will also benefit the entire industry due to the resources developed impacting us but then also being relevant for all other industry members. The use of internal labour, which is familiar with the industry, will enable us to streamline the implementation process and ensure they are of a suitable quality for the industry.

There is a synergy between the activities carried out in section 3.3 and how they will be used to benefit both SFF and the wider industry (i.e. section 3.4). Therefore, most of the expenses enabling the activities in section 3.4 are already covered in section 3.3.

Specifically for section 3.4, we estimate that the completion of this work will cost approximately **75k**. This includes the costs of hiring consultants and contractors to complete the outlined tasks.

We have not included incidental costs required to deliver the outcomes, such as travel. However, we estimate these costs to be around **18k**. We also anticipate that the impact on internal resources will be equivalent to **37 working days**, but we have not assigned a monetary value to this.

3.4.1 Sponsor the development of industry (MIA) specific H&S Guidance Material

The Meat Industry Association (MIA) comprises of four large corporate members, with SFF being the largest, and numerous smaller, often single-site, abattoir operators. The MIA Health & Safety (H&S) Committee, which includes SFF, has been collaborating with HSE Global, a specialist H&S consultancy (https://hseglobal.com/), to develop new industry guidance.

The committee has recognized that while the larger members have more developed and robust health and safety management systems and corporate teams to support their sites, the smaller members often lack this level of support. The smaller operators have requested that more guidance is developed to help these organisations. Therefore, the activity's objective is to develop guidance on managing a health and safety system specifically for a meat processing plant. This guidance will be relevant to the smaller operators but will also include industry-specific advice on best practice for management of hazards such as knife or cleaner safety.

A sponsorship of **30k** has been allocated to support the development of these materials for which HSE Global will complete the work.

3.4.2 In consultation with MIA, develop no less than four training videos focused on key cleaner high-risk tasks.

SFF has recently collaborated with the MIA Health & Safety (H&S) Committee to create a series of basic safety training videos for cleaners. These videos cover topics such as working at height, machine safety, and the proper use of basic Personal Protective Equipment (PPE). The videos have been well-received, particularly due to the inclusion of translations in multiple languages and ease of implementation into existing training programs.

The committee now believes it's necessary to address more specific high-risk tasks, such as the safe handling of hazardous substances during 'fogging'. Fogging, which involves atomizing a sanitizer and distributing it through the air, is one of the riskiest chemical tasks a meat processing cleaner can undertake.

We are committed to developing and funding an additional four videos that focus on specific high-risk topics, which will be determined in consultation with the MIA H&S Committee. These videos will be MIA branded, shared with MIA members, and will include translations for workers who speak English as a second language aligning with the previously developed resources.

We have set aside **45k** for the development of these videos and translation services, which will likely be produced by an external video development company. SFF has internal video development resources that may be available to support this activity. However, their availability is not guaranteed, so we have allocated specific funding to ensure the work can be completed if these internal resources are not available.

3.4.3 Share the learnings of the incident through engagement(s) with other MIA members.

Through consultation with the MIA and its members we will develop an engagement plan that works best for its members. This will likely take the form of a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year. A full debrief of the incident and key learnings will be shared as well as detailing the EU work that we will be completing for them.

3.4.4 Conduct an information sharing event with MIA members providing internal learnings from section 3.3.3 (Rationalised Chemical Use).

Through consultation with the MIA and its members we will develop an engagement plan that works best for its members. This will likely take the form of a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year. A full debrief of the rationalisation work, lessons learned and impacts from the changes (excluding any commercially sensitive information) will be shared. If templates were developed to help implement the activity these will also be shared.

3.4.5 Convert materials developed under section 3.3.4 (Chemical Dispensing Guidance) so they can be used by all MIA members, then provide to MIA.

All resources created for the safe handling of Chemical Dispensing will be rebranded with the MIA logo. Any details that are solely applicable to SFF will be omitted, and additional information or examples will be incorporated to make the material more relevant and useful for a wider industry audience. If requested, the content will be covered during a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year.

3.4.6 Convert materials developed under section 3.3.5 (Chemical First Aid) so they can be used by all MIA members, then provide to MIA.

All resources created for the promotion of chemical first aid awareness will be rebranded with the MIA logo. Any details that are solely applicable to SFF will be omitted, and additional information or examples will be incorporated to make the material more relevant and useful for a wider industry audience. If requested, the content will be covered during a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year.

3.4.7 Conduct an information sharing event with MIA members providing learnings from section 3.3.6 (Instrument Standardisation).

Through consultation with the MIA and its members we will develop an engagement plan that works best for its members. This will likely take the form of a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year. A full debrief of the instrument standardisation work, lessons learned and impacts from the changes (excluding any commercially sensitive information) will be shared. If templates were developed to help implement the activity these will also be shared.

3.4.8 Conduct a physical demonstration of PPE findings from section 3.3.7 (PPE Trial Findings) with MIA members.

Through consultation with the MIA and its members we will develop an engagement plan that works best for its members. This will likely take the form of a video conference or attending the in-person MIA H&S Committee sessions which are held 3 time per year. A full debrief of the PPE Trials and findings, lessons learned and impacts from the changes (excluding any commercially sensitive information) will be shared. This will include physical demonstrations of the PPE and explanations of why and for what reason they were adopted. A specialised information document outlining the findings of the trials will be provided to all attendees to promote similar adoption within their own organisation.

3.4.9 Provide persons with cleaning safety expertise to complete an onsite engagement with at least 10 MIA member organisation.

We acknowledge that merely providing guidance, templates, and resources for organizations to make improvements may not be impactful on its own. By investing significant time and effort, the SFF project team will essentially become experts in safety cleaning for the meat industry.

This activity proposes that the project team members offer onsite engagement and consultation services, particularly for smaller organizations, which will bring more practical benefits to the industry. We are committed to conducting at least 10 onsite engagements with MIA organizations, prioritizing smaller, single-site members.

During these engagements, the project team will identify practical safety improvements for cleaners and provide a report detailing specific actions. In essence, we will act as complimentary consultants. If there is a higher demand than expected, we will strive to accommodate these additional requests.

The project team members will handle these engagements, with travel and incidental expenses covered under existing budgets, as outlined in the foreword.